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Razaghi Healthcare, LLC (Arizona)*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

KORY RAZAGHI,

Plaintiff,

vs.

AHMAD RAZAGHI; MANUEL MORGAN;
MORGAN & RAZAGHI HEALTHCARE,
LLC; RAZAGHI HEALTHCARE, LLC;
RAZAGHI DEVELOPMENT COMPANY,
LLC; and DOES I through X, ROE
CORPORATIONS I through X, inclusive,

Defendants.

Case No. 2:18-cv-01622-GMN-CWH

**DEFENDANT RAZAGHI HEALTHCARE,
LLC (ARIZONA)'S UNOPPOSED MOTION
TO EXTEND ITS DEADLINE TO RESPOND
TO THE FIRST AMENDED COMPLAINT**

(First Request)

Pursuant to LR IA 6-1, Defendant Razaghi Healthcare, LLC (Arizona) ("RH Arizona")
hereby respectfully requests (the "Unopposed Motion") an additional seven (7) days to file a
response to the First Amended Complaint (ECF No. 12). This is RH Arizona's first request for an
extension to respond to the First Amended Complaint.

1 This Unopposed Motion is made and based on papers and pleadings on file, the following
2 Memorandum of Points and Authorities, and any oral argument as may be heard by the Court

3 DATED this 19th day of October, 2018.

4 BAILEY ♦ KENNEDY

5 By: /s/ Paul C. Williams

6 DENNIS L. KENNEDY
PAUL C. WILLIAMS

7 ROTHSTEIN DONATELLI LLP

8 DONNA M. CONNOLLY

9 *Attorneys for Defendants Ahmad Razaghi;
Razaghi Development Company, LLC; and
Razaghi Healthcare, LLC (Arizona)*

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11 **MEMORANDUM OF POINTS AND AUTHORITIES**

12 On September 10, 2018, Plaintiff Kory Razaghi (“Kory”) filed a Certificate of Service
13 containing his First Amended Complaint, which he filed in the Eighth Judicial District Court of the
14 State of Nevada on August 28, 2018—the same day on which Defendant Razaghi Development
15 Company, LLC (“RDC”) removed this action to this Court. (*Compare* ECF No. 12, Certificate of
16 Service *with* ECF No. 1, Notice of Removal.) Kory served RH Arizona with a copy of the First
17 Amended Complaint and Summons on September 28, 2018. (ECF No. 31.) Accordingly, RH
18 Arizona’s response to the First Amended Complaint is currently due on October 19, 2018.

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Pursuant to LR IA 6-1, RH Arizona respectfully requests that its deadline to respond to the First Amended Complaint be extended by seven (7) days—from October 19, 2018 to October 26, 2018. The purpose of the extension is to accommodate the counsel of RH Arizona. Counsel for Kory has indicated that he is not opposed to the extension.

DATED this 19th day of October, 2018.

BAILEY ♦ KENNEDY

By: /s/ Paul C. Williams

DENNIS L. KENNEDY
PAUL C. WILLIAMS

ROTHSTEIN DONATELLI LLP

DONNA M. CONNOLLY

*Attorneys for Defendants Ahmad Razaghi;
Razaghi Development Company, LLC; and
Razaghi Healthcare, LLC (Arizona)*

ORDER

IT IS SO ORDERED:

The deadline for RH Arizona to file its response to the First Amended Complaint (ECF No. 12) is hereby extended from October 19, 2018, to October 26, 2018.


UNITED STATES MAGISTRATE JUDGE

October 22, 2018
Dated: _____

Respectfully Submitted by:

BAILEY ♦ KENNEDY

By: /s/ Paul C. Williams

DENNIS L. KENNEDY
PAUL C. WILLIAMS

ROTHSTEIN DONATELLI LLP

DONNA M. CONNOLLY

*Attorneys for Defendants Ahmad Razaghi;
Razaghi Development Company, LLC; and
Razaghi Healthcare, LLC (Arizona)*

CERTIFICATE OF SERVICE

I certify that I am an employee of BAILEY ♦ KENNEDY and that on the 19th day of October, 2018, service of the foregoing Defendant Razaghi Healthcare, LLC (Arizona)’s Unopposed Motion to Extend its Deadline to Respond to the First Amended Complaint (First Request) was made by mandatory electronic service through the United States District Court’s electronic filing system and/or by depositing a true and correct copy in the U.S. Mail, first class postage prepaid, and addressed to the following at their last known address:

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/s/ Sharon Murnane
Employee of BAILEY ♦ KENNEDY